

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania



Philadelphia Division

Emile J Dominique IV

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Watchtower Bible and Tract Society (Jehovah's Witnesses), Donald Trump, Mike Johnson, Ring, Comcast, The Walt Disney Company, Instagram LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Emile Joseph Dominique IV

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Watchtower Bible and Tract Society (Jehovahs Witnesses)
Job or Title <i>(if known)</i>	
Street Address	1020 Red Mills Road
City and County	WALLKILL, ORANGE COUNTY
State and Zip Code	NY, 12589
Telephone Number	(845)524-3500
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	Donald Trump
Job or Title <i>(if known)</i>	Former President of The United States
Street Address	725 Fifth Avenue
City and County	New York, NEW YORK COUNTY
State and Zip Code	NY, 10022
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	Mike Johnson
Job or Title <i>(if known)</i>	House Speaker of Republican Party
Street Address	568 Cannon House Office Building
City and County	Washington, DC
State and Zip Code	District of Columbia
Telephone Number	(202)225-2777
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	Ring LLC
Job or Title <i>(if known)</i>	
Street Address	12515 Cerise Avenue
City and County	Hawthorne, LOS ANGELES COUNTY
State and Zip Code	CA, 90250
Telephone Number	(800)656-1918
E-mail Address <i>(if known)</i>	

Defendant 5, Defendant 6, Defendant 7 Contact and Addresses

(this document gives extra space as only 4 defendants was the maximum space on the form)

Defendant No. 5

Name: Comcast

Job/Title:

Street Address: 1701 John F. Kennedy Boulevard

City and County: Philadelphia, Philadelphia County

State and Zip Code: PA, 19103

Telephone Number: (215)665-1700

Email Address:

Defendant No. 6

Name: The Walt Disney Company

Job/Title:

Street Address: 500 South Buena Vista Street

City and County: Burbank, Los Angeles County

State and Zip Code: California, 91521

Telephone Number: (818)560-1000

Email Address: dlr.public.relations@disney.com

Defendant No. 7

Name: Instagram LLC

Job/Title:

Street Address: 1601 Willow Rd

City and County: Menlo Park, San Mateo County

State and Zip Code: California, 94025

Telephone Number: (650)543-4800

Email Address: legal@instagram.com

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Please see additional page.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* Emile J Dominique IV, is a citizen of the State of *(name)* Georgia.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

If the Basis for Jurisdiction Is a Federal Question

Part A - Violations

Violation of the 14th Amendment (Equal Protection Clause)

Violation of the 1st Amendment

Violation of the 4th Amendment

Violation of the 5th Amendment

Violation of federal hate crime statutes

Harassment and stalking

Mass exploitation

Religious persecution

Defamation

Invasion of privacy

Emotional distress

Civil rights violations

Abuse of power by high officials

Wrongful pursuit and intimidation

Violations of personal freedoms

Public defamation by influential figures

Systematic oppression

Threats and coercion

Organized efforts to harm

Psychological trauma

Targeted harassment campaigns

Illegal surveillance

Retaliation for personal beliefs and affiliations

Sex and gender discrimination

Mass misrepresentation on TV

Mocking and Bullying through TV

Broadcasting to Millions

Weaponization of TV networks

Weaponization of Instagram Platform

Creators spreading hate

B. If the Basis for Jurisdiction Is Diversity of Citizenship

Defendant 1:

Wathtower Bible and Tract Society

Defendant 1 is incorporated under the laws of Pennsylvania, and currently operates in the state of New York, USA.

Defendant 1 is a corporation.

Defendant 2:

Donald Trump

Defendant 2 is incorporated under the laws of New York, and currently operates in the state of New York, USA.

Defendant 2 is a corporation.

Defendant 3:

Mike Johnson

Defendant 3 is a citizen who currently lives Washington, in the state of District of Columbia.

Defendant 3 is a individual.

Defendant 4:

Ring

Defendant 4 is incorporated under the laws of California, and currently operates in the state of California.

Defendant 4 is a corporation.

Defendant 5:

Comcast

Defendant 5 is incorporated under the laws of Pennsylvania, and operates physically in the states of Pennsylvania, Georgia, Michigan, Colorado, New Hampshire, and New York. Defendant 5 operates electronically in California, Arizona, Colorado, Connecticut, Delaware, Florida, Georgia, Illinois, Indiana, Kansas, Kentucky, Maryland, Massachusetts, Michigan, Missouri, New Jersey, New York, Pennsylvania, Texas, Virginia, and Washington.

Defendant 6:

The Walt Disney Company

Defendant 6 is incorporated under the laws of Delaware, and currently operates in California, Texas, Florida, New York, and Hawaii. Disney also has many more facilities abroad. Defendant 5 operates electronically in all 50 states and territories of the United States.

Defendant 7:

Instagram LLC

Defendant 7 is incorporated under the laws of California, and currently operates physically in California, and New York. Instagram LLC operates electronically in all 50 states and territories of the United States, and abroad all over the world.

b. If the defendant is a corporation

The defendant, *(name)* Watchtower, is incorporated under the laws of the State of *(name)* Pennsylvania, and has its principal place of business in the State of *(name)* New York.

Or is incorporated under the laws of *(foreign nation)*, and has its principal place of business in *(name)*.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Watchtower: 500 Million USD (\$500,000,000)
 Donald Trump: 125 Million USD (\$125,000,000)
 Mike Johnson: 100 Million USD (\$100,000,000)
 Ring: 300 Million USD (\$300,000,000)
 Please see additional page for defendants 5,6, and 7

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See additional page.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See additional page.

Amount In Controversy For Defendant 5, Defendant 6, and Defendant 7:

Comcast: Ten Billion USD (\$10,000,000,000)

The Walt Disney Company: Ten Billion USD (\$10,000,000,000)

Instagram LLC: Five Billion USD (\$5,000,000,000)

Statement of Claim:

Defendant 1: Watchtower Bible and Tract Society (Jehovah's Witnesses)

Respectfully, your honor, defendant 1 has ruined my life before it started. For many years, the defendant has led mass defamation, and pretended that I was a threat to public safety. Defendant 1 has used their social connections, and wealth to use TV networks such as Comcast, and other major networks to publish defamation, hate speech, mockery, broadcast my personal business, and persuade others to believe that I am the worst person on Earth. Further, defendant 1 has been using their government ties to go after and persecute me, for example, hiring actors to act out scenarios, and registering false crimes in my name that never happened.

Respectfully, your honor, this extends to unjustified suspicion, and the empowerment of weaponizing law enforcement against members who no longer agree with defendant 1's cult practices and beliefs. Combining injustice, unjustified suspicion, and the private sector makes for a life where I am not safe, a life where I cannot live in dignity, and peace. My despair and injustice, being televised, and praised, has made it **impossible** for me to buy a home, build wealth, get critical fertility care so that I can start a family, and start a profitable business. Defendant 1 has gotten all of their ultra wealthy corporations, and allies to massively persuade people through various TV networks that I have no human rights, and that such treatment is justified. They have gone very far out of their way to make sure that I would never again have respect, dignity, and that I would never even have the opportunity to build wealth.

Respectfully, your honor, I finally was able to get help, and I have been diagnosed with High Functioning Autism, ADHD, and OCD. I also have proper medicine/remedies that makes me function in a stable, sane, and productive manner. I have been able to focus, and complete things that I start over the last two years. As I considered having kids late 2022, I bought my first boys and girls puberty books and looked for signs for fertility. I recorded 9 monthly periods for 2023, and learned that I was intersex.

Respectfully, your honor, I say that all because these circumstances merit even greater consequences for the defendants. Not only was I born intersex, but I was not being inconsistent with jobs intentionally. I was not socially impaired intentionally. I was not always having anxiety attacks intentionally. I was not a bad communicator intentionally. I was not able to deal with crowds well intentionally. I had no knowledge that I was intersex. Even though I have proper care now and am functioning far better, the damage has been done.

Respectfully, your honor, their actions have been extremely cowardly, and are illegal under the

Americans With Disabilities Act. Defendant 1 has violated most of the constitution violations on the list that is on the additional page. The damages are catastrophic, and Watchtower Bible and Tract Society must be held accountable. All of this has resulted in years of emotional distress, financial loss, and reputational damage.

Defendant 2: Donald Trump

Respectfully, your honor, defendant 2 has massively defamed me on live TV at least twice this year. Defendant 2 skillfully used aliases, to target me, and everyone knew who he was **really** talking about. This was especially the case on July 4, 2024, and July 9, 2024. These two speeches were so out of line, and angered many republicans. The defendant has also led a major attack on me in 2022, rallying all of his supporters, and the far right to hate me, deny me a place in society, and deny me for service of any kind. At least one content creator who has a news channel, has openly stated that Donald Trump's supporter base is blaspheming Christ for Trump. Other content creators have explained how the far right cannot accept the Messiah for who she is, and agree that Donald Trump is abusing his power, and should be held accountable.

Respectfully, your honor, Donald Trump hates people who have a difference of sex and gender, and embrace themselves for who they are. The damages are catastrophic, and Mr. Donald Trump must be held accountable. Further, Donald Trump has more recently used aliases to attack me in his allies commercials, in his MAGA emails, text messages and speeches. He is calling me a "bug", "crazy", and has made AI images making fun of me as immoral and dirty. Again, everyone knows who he is really talking about beyond the alias. Donald Trump is ultimately criticizing my sex and gender, how I express myself, my culture, and is acting out of hate. His defamation may make it harder for me to find love and have a family as well. Just because my culture is very different from his does not justify his over the top hatred, and he should pay for the damage he has caused. Many women, intersex women, and transwomen have culture different than MAGA women. His actions have resulted in emotional distress, financial loss, and reputational damage.

Defendant 3: Mike Johnson

Respectfully, your honor, defendant 3 works closely with extremist republicans, to take away my freedom on a personal level. Mike Johnson claims that the viral TikTok girl (me) is a threat to national security. I inspire many women, intersex women, and trans women to embrace their

own "freak" and to be themselves without an apology. I inspire women to be as feminine as their hearts desire, without shame. Mike Johnson is angry because I was a Louisiana resident at one time, and I abandoned ignorant, narcissitic, failed beliefs that are often unfair, and unrealistic in a larger populus. Mike Johnson has too great of responsibility to target someone who is not a running mate for the house. Mike Johnson is not really after TikTok, he is after me.

Respectfully, your honor, like defendant Donald Trump, Mike Johnson also is using aliases, while everyone knows who he is really after. It is very clear that Mike Johnson is abusing his power, going after the joy and happiness movement, and he seems to want anger, and hatred. Defendant 3 has made it clear that he is jealous of people who have the courage to be themselves all the way, without an apology. Mike Johnson has worked closely with republicans to deny me service, social justice, and have cause for harassment, and discrimination. Mike Johnson is leading an attack not just on me, but on all women, intersex women, and trans women everywhere. Mike Johnson must be held accountable.

Respectfully, your honor, according to defendant 3, I am a threat to national security, and MAGA has even made a video of it, called "Creator". In the first movie trailer of this film, MAGA used aliases of me, and told on themselves. In the movie, I was a little chinese girl, with enoromous influence, being hunted for committing no crime. MAGA used the aliases of "ai" and said in the movie that "for as long as AI is a threat, we will never stop hunting him", and "what will you do with the child", in which a general said "execute her, or we go extinct". MAGA Mike Johnson and republicans revealed there to the whole world everything that they were doing. Mike Johnson and his republicans made it clear that there is one person, a female, who is their top target in the real world. Mike Johnson has caused me great mental distress, reputational harm, and financial loss.

Defendant 4: Ring

Respectfully, your honor, Ring illegally passed a video of me disagreeing with a family member to wealthy musicians such as Billie Eilish, as well as various other networks. At first, I listened to the musician, and thought that the artist was admiring me, and coming from a place of understanding. I liked the musicians videos, and even opted in to her email list. Not long after, I realized that the exact opposite was happening. The musician had illegally been using the video that Ring provided her, to make large profits. My social impariment made it hard to discern the reality, however when I did, I opted out of everything with that artist.

Respectfully, your honor, it's not Billie Eilish's business, or Hollywoods business, or anyone elses business. Billie Eilish used the video to earn large profits of money from a family matter, that

was supposed to stay within our family. The family matter was handled, however the video really showed the level of unfair treatment that I get, and the video showed the world that the only peace I have on Earth is my room. That is one reason there was large amounts of anger in the video. I was okay for a while, however I really dislike injustice, and given the amount of injustice I already faced, me not having peace in my room was horrifying. Peace was all I had left.

Respectfully, your honor, I have a very good relationship with my mother who was in the video. I spoil my mother as much as I can, and help her as much as possible on a daily basis. I respect her, and treat her like gold. Billie Eilish and the music industry has acted as a systematic oppressor, using my injustice as a means to an end. In Billie Eilish's song "I can eat that girl for lunch", and some of her music videos, she misrepresents me as being one who indulges in alcohol, and drugs. This is not true. I do not engage in alcohol or drugs. Ring must be held accountable for this tragedy, and pay for profiting off of systematic oppression, and injustice. Ring has especially caused me financial loss, reputational harm, and mental distress.

Defendant 5: Comcast

Respectfully, your honor, Comcast has weaponized TV media against me, and has had far reaching effects. Throughout 2019 to present, defendant 5 has attacked me through defamation, hate speech, mockery, broadcast my personal business, and persuade others to believe that I am "Satan". Just like the other defendants, defendant 5 also skillfully used aliases, actors, and persons, when everyone watching knew, exactly who Comcast was talking about.

Respectfully, your honor, Comcast has also violated all of my human rights, and tapped my devices, especially my android devices. Comcast was profiting off of personal information, and stole many files that did not belong to them. Further, Comcast has targeted me massively in commercials, movies, books, podcast, and all other media. It's very clear that I am the one who Comcast was targeting, and Comcast themselves didn't even try to hide it. Comcast has led a misrepresentation campaign against me for years, to persuade people to believe that I was not worthy of a good life.

Respectfully, your honor, Comcast has made premeditated commercials, and shown them on TV exactly when I enter a room, or turn on the TV, as a form of mass cyberbullying, and as systematic oppression. I have been called a "dog" too many times to count, a "bug", "crazy", and even an animal on many occasions. There is no evidence to support any of those claims. Really, Comcast hates me, and is jealous because so many people put faith in me anywhere I go. They are mad because it's not them.

Respectfully, your honor, Comcast has been leading a "trash show" since early 2022, scamming persons to believe that I am either married, in a relationship, or looking for love. After thorough investigation of the matter, I have repeatedly stated that I am happily single, and never married. This "trash show" is a weaponization of media, in which Comcast hopes will lower my value, and accuse me of being a low value, desperate, and stalker type of person. They hope that their campaign will block the right person for me, and make sure that I am disgraced out of ever being loved.

Respectfully, your honor, I am not in a love relationship, was never married, and am happily single. I make that clear now. In the end, Comcast has shown that they will do anything, no matter how crazy, or wrong, to ruin my life, and ensure that I never obtain wealth, a home, my own family, and love. They have done everything to stop me from ever rising, and traveling the world. Comcast has shown deep fear of me succeeding, and escaping their oppression.

Respectfully, your honor, I finally was able to get help, and I have been diagnosed with High Functioning Autism, ADHD, and OCD. I also have proper medicine/remedies that makes me function in a stable, sane, and productive manner. I have been able to focus, and complete things that I start over the last two years. As I considered having kids late 2022, I bought my first boys and girls puberty books and looked for signs for fertility. I recorded 9 monthly periods for 2023, and learned that I was intersex.

Respectfully, your honor, I say that all because these circumstances merit even greater consequences for the defendants. Not only was I born intersex, but I was not being inconsistent with jobs intentionally. I was not socially impaired intentionally. I was not always having anxiety attacks intentionally. I was not a bad communicator intentionally. I was not able to deal with crowds well intentionally. I had no knowledge that I was intersex. Even though I have proper care now and am functioning far better, the damage has been done. Comcast has especially caused me financial loss, reputational harm, and mental distress.

Defendant 6: The Walt Disney Company

Respectfully, your honor, defendant 6 has mocked, defamed, and spread hatred for me, though their movies. Defendant 6 used aliases, fictitious characters, and actors to misrepresent me, disrespect me, and arouse hatred for me. Disney has engaged in mass defamation, mass mockery, mass stalking, mass invasion of my privacy, mass cyberbullying against me.

Respectfully, your honor, Disney has tried to make peace and apologize, however my life remains in ruins, and without respect, and dignity, and justice, nothing has changed from the time that they started their attack. Without justice, or accountability Disney will continue their

efforts to discredit me, misrepresent me, and raise hatred for people of a difference in sex, and gender. Many of the people behind it are in cults, and religion. These persons have no empathy, regard, or concern for people who do not believe the same as they do.

Respectfully, your honor, Disney staff especially hate me, because I am a bigger faith leader than them, and they were not anointed to be the Messiah. The people who operate Disney are especially upset that the Messiah is a woman, and they just can't live with it. These ones believe that femininity is inferior, and practice willful ignorance.

Respectfully, your honor, I finally was able to get help, and I have been diagnosed with High Functioning Autism, ADHD, and OCD. I also have proper medicine/remedies that makes me function in a stable, sane, and productive manner. I have been able to focus, and complete things that I start over the last two years. As I considered having kids late 2022, I bought my first boys and girls puberty books and looked for signs for fertility. I recorded 9 monthly periods for 2023, and learned that I was intersex.

Respectfully, your honor, I say that all because these circumstances merit even greater consequences for the defendants. Not only was I born intersex, but I was not being inconsistent with jobs intentionally. I was not socially impaired intentionally. I was not always having anxiety attacks intentionally. I was not a bad communicator intentionally. I was not able to deal with crowds well intentionally. I had no knowledge that I was intersex. Even though I have proper care now and am functioning far better, the damage has been done. The Walt Disney Company has especially caused me financial loss, reputational harm, and mental distress.

Defendant 7: Instagram LLC

Respectfully, your honor, the damages of social media can be less than TV media, or greater than TV media. In my case, I made my first Instagram account around late 2021 as I can recall. I ended up deleting my account as I seen high celebrities weaponizing the platform against me, having massive likes, shares, and comments. One particular video had an alias of me, suffering from diabetes, mocking how my lips rub together. I was shocked to find many other famous creators putting out large amounts of hate, disrespect, misrepresentation, and slander against me.

Respectfully, your honor, Instagram did not take these posts down, and in fact, Instagram made large profits off of this relentless hate. As stated multiple times, my disability of ADHD, and High Functioning Autism made me socially impaired, and I did not have help for 26 years. Thus, the behavior of these celebrities and other influencers was overly critical, unfair, and one sided.

Respectfully, your honor, I finally was able to get help, and I have been diagnosed with High Functioning Autism, ADHD, and OCD. I also have proper medicine/remedies that makes me function in a stable, sane, and productive manner. I have been able to focus, and complete things that I start over the last two years. As I considered having kids late 2022, I bought my first boys and girls puberty books and looked for signs for fertility. I recorded 9 monthly periods for 2023, and learned that I was intersex.

Respectfully, your honor, I say that all because these circumstances merit even greater consequences for the defendants. Not only was I born intersex, but I was not being inconsistent with jobs intentionally. I was not socially impaired intentionally. I was not always having anxiety attacks intentionally. I was not a bad communicator intentionally. I was not able to deal with crowds well intentionally. I had no knowledge that I was intersex. Even though I have proper care now and am functioning far better, the damage has been done. Instagram LLC has especially caused me financial loss, reputational harm, and mental distress.

Relief

Defendant 1: Watchtower and Bible Tract Society (Jehovah's Witnesses)

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$400,000,000 USD, for emotional distress, financial loss, and reputational damage caused by defendant 1's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$100,000,000 USD, to punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory and harmful actions against the plaintiff.

Defendant 2: Donald Trump

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$100,000,000 USD, for emotional distress, financial loss, and reputational damage caused by defendant 2's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$25,000,000 USD, to punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory and harmful actions against the plaintiff.

Defendant 3: Mike Johnson

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$75,000,000 USD, for emotional distress, financial loss, and reputational damage caused by defendant 3's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$25,000,000 USD, to

punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory and harmful actions against the plaintiff.

Defendant 4: Ring

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$250,000,000 USD, for emotional distress, financial loss, and reputational damage caused by defendant 4's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$50,000,000 USD, to punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory and harmful actions against the plaintiff.

Defendant 5: Comcast

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$9,000,000,000 USD, for emotional distress, financial loss, and reputational damage caused by defendant 5's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$1,000,000,000 USD, to punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory, oppressive, and harmful actions against the plaintiff.

Defendant 6: The Walt Disney Company

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$9,000,000,000 USD, for emotional distress, financial loss, and reputational damage caused by

defendant 6's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$1,000,000,000 USD, to punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory, oppressive, and harmful actions against the plaintiff.

Defendant 7: Instagram LLC

Compensatory Damages: The plaintiff seeks compensatory damages in the amount of \$4,000,000,000 USD, for emotional distress, financial loss, and reputational damage caused by defendant 7's actions.

Punitive Damages: The plaintiff seeks punitive damages in the amount of \$1,000,000,000 USD, to punish the defendant for their willful and malicious conduct.

Injunctive Relief: The plaintiff requests an injunction to prevent the defendants from continuing their defamatory, oppressive, and harmful actions against the plaintiff.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/22/2024

Signature of Plaintiff

Emile J Dominique IV



Printed Name of Plaintiff

Emile J Dominique IV

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address